

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION**  
**OF SOUTH CAROLINA**  
**DOCKET NO. 2005-13-W/S**

IN RE: Application of Wyboo Plantation	)	
Utilities, Inc. for Approval of New	)	
Schedule of Rates and Charges for	)	<b>Office of Regulatory Staff's Second</b>
Water and Sewer Services	)	<b>Continuing Data Request</b>
_____	)	

**TO: JOHN F. BEACH, ESQUIRE, ATTORNEY FOR THE APPLICANT, WYBOO PLANTATION UTILITIES, INC. ("Wyboo" or "the Company")**

**INSTRUCTIONS**

The South Carolina Office of Regulatory Staff ("ORS") hereby requests, pursuant to 26 S.C. Code Regs. 103-853 (Supp. 2004), that the Applicant answer the following data requests in writing and under oath and serve the undersigned within ten (10) days after service of this data request to ORS at 1441 Main Street, Suite 300, Columbia, South Carolina, 29201. If you are unable to respond to any of the data requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these data requests, "identify" means, when asked to identify a person, to provide the full name, title, current address and telephone number of the person. When asked to identify or provide a document, "identify" and "provide" mean to provide a full and detailed description of the document and the name and address of the person who has custody of the document. In lieu of providing a full and detailed description of a document, you may attach to your responses a copy of the document and identify the person who has custody of it.

When the word "document" is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings. As used in this data request, "address" means mailing address and business address.

Wherever in this data request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

IT IS HEREIN REQUESTED:

- A. That all information shall be provided to the undersigned in the format as requested.
- B. That all responses to the requests below be labeled using the same numbers as used herein.
- C. That each of the enumerated data requests be reproduced at the beginning of each of the responses.
- D. That if the requested information is found in other places or in other exhibits, reference not be made to those, but instead, that the information be reproduced and placed in the data request in the appropriate sequence.
- E. That any inquiries or communications relating to questions concerning clarifications of the data requested below be directed to the undersigned.
- F. That all exhibits be reduced to 8 ½" x 11" format, where practical.
- G. That the requested information be bound in ring binders (loose leaf notebooks) or otherwise suitably bound.
- H. That in addition to the signature and verification at the close of the Company's responses, the Company witness(es) or employee(s) responsible for the information contained in each response be indicated.

- I. That the Company provide to ORS two copies of the responses to this data request as soon as possible but no later than ten (10) days after service thereof.
- J. If the response to any data request is that the information requested is not currently available, please state when the information requested will be available.
- K. This data request shall be deemed to be continuing so as to require the Company to supplement or amend its responses as any additional information becomes available.

### **QUESTIONS**

- 2.1 Identify any construction and/or upgrades proposed for or taking place at facilities operated by Wyboo since the last rate case application was filed. Provide the project description and timeframe for completion.
- 2.2 State the actual and projected costs of each construction and/or upgrade listed in response to 1.1.
- 2.3 Identify all businesses that share the same office space as Wyboo. If applicable, what is the allocation percentage for each business that shares the same office space as Wyboo? What is the basis used to determine the allocation percentage?
- 2.4 List all real estate and land rights owned by Wyboo. If applicable, state the date of the purchases or acquisitions, the purchase price, and the location of the real estate and the physical areas to which any land rights apply.
- 2.5 Provide a detailed listing of the number of residential and commercial customers as of January 1, 2005 and September 1, 2006. Provide a detailed breakdown in the same format as Exhibit 6 of the company's August 17, 2006 Application.
- 2.6 State Wyboo's practices and procedures for employee and officer bonuses.
- 2.7 Provide any written guidelines for inspecting systems and/or performing maintenance on Wyboo systems. Provide a schedule of maintenance for all systems owned or operated by Wyboo, indicating maintenance type and status (i.e. completed, on-going, anticipated, etc.) for the following years: 2004, 2005, 2006, 2007, and 2008.
- 2.8 Does Wyboo have any outstanding violations noted by DHEC since the last rate case data request? If so, what are they and provide a copy of the documentation generated by DHEC (i.e., notice of violations, warning letters, etc.). If applicable, provide a copy of Wyboo's response.

- 2.9 Provide the most current DHEC Drinking Water Sanitary Survey for all drinking water systems owned or operated by Wyboo.
- 2.10 Provide the most current DHEC Wastewater Treatment Facility Operation and Maintenance Evaluation Report for all wastewater systems owned or operated by Wyboo.
- 2.11 Provide a copy of the complete customer complaint log detailing all recorded customer service and billing complaints for the drinking water and sewer systems during the test year ending December 31, 2005.
- 2.12 Provide a copy of the complete customer complaint log detailing all recorded customer service and billing complaints for the drinking water and sewer systems for the time period January 1, 2006 through September 1, 2006.
- 2.13 List, in chronological order, by year, by customer classification and by month, the total number of bills issued to customers during 2003, 2004 and 2005. Use test year period for each year that is presented.
- 2.14 Provide the amount of accrued interest on customer deposits as of January 1, 2005 and December 31, 2005. Provide information on the amount of deposits and interest returned to customers during the test year and any amount provided to the State of South Carolina pursuant to the Unclaimed Property Act.
- 2.15 Provide the amount listed in uncollectible accounts as of January 1, 2005 and December 31, 2005 and provide the calculation for the proposed uncollectibles associated with the rate increase.
- 2.16 Provide all water consumption data for the test-year ending December 31, 2005. Include information about the amount of water pumped and sold by Wyboo during the test year ending December 31, 2005 including gallons billed by test-year month.
- 2.17 Provide the amount paid by Wyboo for Safe Drinking Water Act (“SDWA”) fees during the test year ending December 31, 2005 and 2004. Provide an estimate of the SDWA fees due for 2006.
- 2.18 Provide the complete detail of all “Returns and Allowances” for the test year ending December 31, 2005 as listed in Exhibit 2 of the company’s Application (Company Information No. 2 page 1 and Company Information No. 5 pages 2 and 3.)
- 2.19 Provide the amount in gallons of non account (non revenue) water by month during the test year ending December 31, 2005.

- 2.20 Explain how tariff section labeled “Billing of Tenants” (Page 5 of amended Proposed Schedule of Rates and Charges) complies with S.C. Code Ann. § 27-33-50(B) (Supp.2005). Specifically address how Wyboo intends to implement this clause for a multi-unit building consisting of less than four residential units served by a master meter or single connection. Describe what process Wyboo will use to handle delinquent customers of a multi-unit building consisting of less than four residential units served by a single meter or within a mobile home park.
- 2.21 Is the expense cost for Wyboo to comply with the National Primary Drinking Water Regulations: Stage 2 Disinfectants and Disinfection Byproducts Rule that was promulgated by EPA on January 4, 2006 included with this rate adjustment request? If so, please provide the details of the cost associated with compliance and the schedule for submittal of the various documents to the appropriate regulatory authority.
- 2.22 The section labeled as “Disconnection/Re-Connection Fee” discusses the reconnection charge for sewer service. Provide cost justification detail(s) for disconnection/re-connection fee. Explain how Wyboo will charge a customer when an elder valve exists as required by Commission Order No. 94-367.
- 2.23 The Schedule of Proposed Rates and Charges section labeled “Grinder Pumps, Step Systems, and Solids Interceptor Tanks” contains language requiring the customer to “reimburse the Utility for all costs, including materials, third party labor, Utility labor and overhead, associated with such maintenance” for Wyboo “to maintain proper function of the System, to perform any maintenance, on or related to customer grinder pump, step system, and/or solids interceptor tank, including its installation or replacement.” Also, the application states that “a Customer who uses a solids interceptor tank to receive sewerage service from the Utility or to continue to receive such service, the Customer shall install at the Customer’s expense a visual inspection port which will allow for observation of the contents of the solids interceptor tank and extraction of test samples therefrom.” Provide details of the specific cost(s) applicable to the customer for all maintenance, installation and/or replacement services on grinder pumps, step systems and/or solids interceptor tanks.
- 2.24 The original permit issued to Wyboo by DHEC states that Wyboo “must be responsible for the operation, maintenance, and replacement of all system components beginning with the solids interceptor tanks.” Provide documentation detailing DHEC’s granted permit change.
- 2.25 How is sewer service provided to the Cedar Hills and Granada mobile home park communities? Please explain.
- 2.26 Provide details of the prepaid water and sewer tap revenues listed in Exhibit 2 of the Company Information No. 5 pages 2 and 3 of the application. Identify the

customer, date of receipt, amount received per customer, meter or line size, and the justification for each prepaid amount.

- 2.27 Were there any prepaid water and sewer tap revenues received during the years 2003, 2004, and 2006? If so, please provide the identification of the customer, date of receipt, amount received per customer, and the justification for each prepaid amount.
- 2.28 Provide details of the “DHEC Testing Revenues” listed in Exhibit 2 of the Company Information No. 5 pages 2 and 3 of the application. Identify the customer, date of receipt, amount received per customer, meter or line size, and the justification for each amount.
- 2.29 Provide details and cost justification for the \$1,600 “Impact Fee” that is listed in Exhibit 3 of the Company Information No. 9 pages 1, 2 and 3 of the application. Explain the purpose of the “Impact Fee.”
- 2.30 Provide further details and justification for the \$1,425.00, \$1,622.34, and \$2,604.82 meter installation cost that are listed in Exhibit 3 of the Company Information No. 9 pages 1, 2 and 3 of the application.
  - a. Explain if charges are minimum, average, or maximum cost to install a meter.
  - b. Explain if each meter installation requires the same amount of fill material (\$250.00), standard backhoe (\$245.00), and installation labor cost (\$600.00).
- 2.31 Provide the single family equivalent (SFE) (or multiplier) for each of the customers listed in Exhibit 6 of the application.
- 2.32 What type of equipment is listed in Exhibit 7 of the application that was purchased by Wyboo in January 2003? Please identify.
- 2.33 For the items that were purchased or obtained in April and June of 2001 (i.e., WWTFs, water storage tank, sewer lines, water lines, etc.), please identify along with any associated capacity and/or length.
- 2.34 Please explain the inconsistency with the Commission rules and regulations for applying late penalties and discontinuance of service. Per the bill form (Application Exhibit 9) a “1.5% Fee will be added on the 15<sup>th</sup> day to the unpaid balance. Cut Off after 20 days from due date.” If a waiver of Commission regulations has been received by Wyboo relating to the late penalties and the discontinuance of service, provide a copy of the Commission order.
- 2.35 The section on Extension of Utility Service Lines and Mains discusses how certain customers are added. Explain how this requirement applies to a customer on the opposite side of the roadway that desires service. Identify if the customer

would be required to pay all cost(s) to bore under the roadway. Identify any additional charges that would be incurred by a new customer above and beyond the proposed tap fee.

- 2.36 Provide detailed number of water meters installed for customers served by Wyboo. Detail shall include specific number of meters, meter size, type, cost and installation address.
- 2.37 Explain Wyboo's request for a flat-fee based water rate. Provide detailed rate design schedules for all rates identified in the Proposed Schedule of Rates and Charges included in the Application.
- 2.38 Provide justification for differential in proposed rates for Residential water/sewer and Commercial water/sewer.
- 2.39 Provide copies of all existing and proposed special contracts binding Wyboo to a third party. Special contracts would include but not be limited to contracts for maintenance, construction agreements, and rate agreements.
- 2.40 Explain Wyboo's collection process for customers who move out of Wyboo's service territory yet have a balance due for services rendered. Provide examples of this practice for the test year ending December 31, 2005 and for the time period of January 1, 2006 to September 1, 2006.

September 12, 2006

/s/ C. Lessie Hammonds  
Wendy B. Cartledge, Esquire  
C. Lessie Hammonds, Esquire  
**South Carolina Office of Regulatory Staff**  
Post Office Box 11263 (29211)  
1441 Main Street, Suite 300  
Columbia, South Carolina 29201  
Phone: 803-737-0800  
Facsimile: 803-737-0895

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2005-13-WS**

IN RE:	)	
	)	
Application of Wyboo Plantation Utilities,	)	
Incorporated for Approval of New Schedule	)	<b>CERTIFICATE OF</b>
Of Rates and Charges for Water and Sewer	)	<b>SERVICE</b>
Services	)	

This is to certify that I, Pamela J. McMullan, an employee with the Office of Regulatory Staff, have this date served one (1) copy of the **OFFICE OF REGULATORY STAFF'S SECOND CONTINUING DATA REQUEST** in the above-referenced matter to the person(s) named below by causing said copy to be deposited in the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below:

**John F. Beach, Esquire**  
Ellis Lawhorne & Sims, PA  
Post Office Box 2285  
Columbia, SC 29202

**Charles Cook, Esquire**  
Elliott & Elliott  
721 Olive Street  
Columbia, SC 29205

/s/ Pamela J. McMullan  
Pamela J. McMullan

September 12, 2006  
Columbia, South Carolina